

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

## Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**Re: Docket No. 426**

**CERTIFICATION OF COUNSEL REGARDING  
MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) ESTABLISHING  
PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR PROFESSIONALS AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to Joann, Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On February 13, 2025, the *Motion of Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 426] (the “Motion”) was filed with the United States Bankruptcy Court for the District of Delaware (the “Court”). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the “Proposed Order”).

2. A hearing on the Motion was set to be held on March 6, 2025, at 2:00 p.m. (prevailing Eastern Time) and any objections or responses to entry of the Proposed Order were to be filed and served on the undersigned proposed counsel by February 27, 2025 at 4:00 p.m.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

(prevailing Eastern Time) (the “Objection Deadline”), except for the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) whose deadline was extended to March 3, 2025 at 4:00 p.m. (prevailing Eastern Time).

3. Prior to the Objection Deadline, the Debtors received informal comments to the Proposed Order from the U.S. Trustee.

4. The Debtors revised the Proposed Order to address the informal comments received from the U.S. Trustee, and the parties agreed to a revised form of order, a copy of which is attached hereto as **Exhibit 1** (the “Revised Order”).

5. A blackline comparing the Revised Order against the Proposed Order is attached hereto as **Exhibit 2**.

6. The Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

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Dated: March 4, 2025  
Wilmington, Delaware  
/s/ Patrick J. Reilley

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